

Bianca Thornton

From: Brendan.M Hurley <Brendan.M.Hurley@fire.nsw.gov.au>

Sent: Friday, 11 September 2020 10:37 AM

To: Susan Fox <Susan.Fox@planning.nsw.gov.au>

Cc: Fire Safety <FireSafety@fire.nsw.gov.au>

Subject: RE: Notice of Exhibition – Chullora Materials Recovery Facility (SSD-10401). BFS20/2499

Notice of Exhibition – Chullora Materials Recovery Facility (SSD-10401)

Dear Susan,

Please see the updated email.

Thank you for your submission for the above development to Fire + Rescue NSW (FRNSW) for review and comment.

It is understood that SUEZ Recycling & Recovery Pty Ltd (SUEZ - the Applicant) are seeking to establish a state-of-the-art Resource Recycling Park located at 21 Muir Road (Lot 2 DP1227526), Chullora in Sydney (the Chullora RRP). The Applicant are proposing to develop and operate the first phase of the Chullora RRP as a Materials Recycling Facility (MRF) (the Proposal) to process co-mingled and source separated recyclable from municipal sources and dry commercial and industrial (C&I) waste; with a material processing capacity of up to 172,000 tonnes per annum (tpa).

It has been the experience of FRNSW that waste recycling facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

FRNSW submit the following general comments and recommendations for consideration:

- FRNSW note that a SEPP 33 assessment has been undertaken in the development of the Environmental Impact Statement (EIS).
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Fire safety in waste facilities* be addressed. Advice and recommendations contained within the guideline have been developed to enable FRNSW to adequately manage an incident at such facilities.
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Emergency Vehicle Access* be addressed. This is required such that FRNSW are able to safely access all parts of the site where an incident may occur.
- It is recommended that provisions be made for the containment of contaminated fire water run-off based on the worst credible fire scenario for the site. Any system(s) provided is to be automatic in nature and should not rely upon on-site staff or emergency services personnel to access or activate provided systems or valves in the event of fire.
- It is recommended that if the development proposes to incorporate a fire engineered solution (FES), whether a building design having a performance solution in accordance with the *National Construction Code (NCC)* or other infrastructure where building codes are not applicable, FRNSW should be engaged in the fire engineering brief (FEB) consultation process at the preliminary design phase, post approval of the development application. FRNSW also recommend that clauses E1.10 and E2.3 be addressed where a FES is required.

- It is recommended that a Condition of Consent be included that would require the fire and life safety measures for the development to be reassessed for adequacy in the event that either; significant changes are made to the site configuration, processing capacity is increased from 172,000 tpa, or there are changes to either the accepted waste streams or a significant increase in streams that are combustibile in nature.
- It is recommended that the an emergency plan for the waste facility in accordance with *AS 3745–2010 Planning for emergencies in facilities* be prepared for the development. An external consultant should be engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/2499. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.



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PREPARED FOR ANYTHING.

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